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7 *Attorneys for Debtors and Reorganized  
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9  
10 **UNITED STATES BANKRUPTCY COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION**

13 In re:

14 **PG&E CORPORATION,**

15 **- and -**

16 **PACIFIC GAS AND ELECTRIC COMPANY,**

17 **Debtors.**

18  Affects PG&E Corporation  
19  Affects Pacific Gas and Electric Company  
 Affects both Debtors

\* *All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**STIPULATION ENLARGING TIME  
FOR LISA BURCHFIELD ET AL.  
TO FILE PROOFS OF CLAIM**

[Related to Dkt. Nos. 9796-97]

Resolving Motion Scheduled for Hearing  
January 12, 2021 at 10:00 am PT

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1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the  
2 “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized**  
3 **Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”), on the one hand, and Lisa  
4 Burchfield, M.B. (a Minor), D.E. (a Minor), Cory Olson, Kylie Olson, Samantha Perry, Cambria  
5 Reese, and David Shepperd (collectively, the “**Movants**”), on the other hand, by and through  
6 their respective counsel, hereby submit this stipulation (the “**Stipulation**”) for an order enlarging  
7 the time for Movants to file claims in these Chapter 11 Cases as set forth herein. The  
8 Reorganized Debtors and Movants are referred to in this Stipulation collectively as the “**Parties**,”  
9 and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

10 **RECITALS**

11 A. On January 29, 2019 (the “**Petition Date**”), the Debtors commenced these Chapter 11  
12 Cases in the United States Bankruptcy Court for the Northern District of California (the  
13 “**Bankruptcy Court**”).

14 B. By Order dated July 1, 2019 [Docket No. 2806] (the “**Bar Date Order**”), the  
15 Bankruptcy Court set October 21, 2019 at 5:00 p.m. (Prevailing Pacific Time) (the “**Original Bar**  
16 **Date**”) as the deadline in these Chapter 11 Cases for filing proofs of claim in respect of any of  
17 prepetition claim (as defined in section 101(5) of the Bankruptcy Code) against either of the Debtors,  
18 including all claims of Fire Claimants,<sup>1</sup> Wildfire Subrogation Claimants, Governmental Units (as  
19 defined in section 101(27) of the Bankruptcy Code), and Customers, and for the avoidance of doubt,  
20 including all secured claims and priority claims.

21 C. By Order dated November 11, 2019, the Bankruptcy Court extended the Bar Date  
22 until December 31, 2019 at 5:00 p.m. (Prevailing Pacific Time), solely for the benefit of any non-  
23 governmental Fire Claimants who had not filed proofs of claim by the Original Bar Date.

24 D. By Order dated June 20, 2020 [Dkt. No. 8053] the Bankruptcy Court confirmed the  
25 *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19,*

26  
27 <sup>1</sup> Capitalized terms used but not otherwise herein defined have the meanings ascribed to such terms  
28 in the Bar Date Order or the Plan (as defined below), as applicable.

1 2020 (as may be further modified, amended or supplemented from time to time, and together with  
2 any exhibits or scheduled thereto, the “**Plan**”). The Effective Date of the Plan occurred on July 1,  
3 2020. *See* Dkt. No. 8252.

4 E. On December 11, 2020, Movants filed the *Motion to Allow/Deem Timely Late Filing*  
5 *of Proofs of Claim* [Dkt. No. 9796] (the “**Motion**”), in which Movants asserted that each of them  
6 should be permitted to file a late claim for damages allegedly sustained as a result of the North Bay  
7 Fires (the “**Asserted Fire Victim Claims**”). The Motion is set for hearing on January 21, 2021 (the  
8 “**Hearing**”). *See* Dkt. No. 9797.

9 F. On December 4, 2020, Lisa Burchfield filed Proof of Claim No. 106841, M.B. (a  
10 Minor) filed Proof of Claim No. 106842, D.E. (a Minor) filed Proof of Claim No. 106840, Cory  
11 Olson filed Proof of Claim No. 106845, Kylie Olson filed Proof of Claim No. 106848, Samantha  
12 Perry filed Proof of Claim No. 106833, Cambria Reese filed Proof of Claim No. 106831, and David  
13 Shepperd filed Proof of Claim No. 106836, each on account of their respective Asserted Fire Victim  
14 Claims (collectively, the “**Proofs of Claim**”).

15 G. Pursuant to the Plan, all Fire Victim Claims were channeled to the Fire Victim Trust  
16 on the Effective Date and are subject to the Channeling Injunction, and any liabilities of the Debtors  
17 or the Reorganized Debtors, as applicable, for any Fire Victim Claims have been fully assumed by,  
18 and are the sole responsibility of, the Fire Victim Trust, and shall be satisfied solely from the assets  
19 of the Fire Victim Trust. *See* Plan §§ 4.7(a), 4.26(c), 6.7(a).

20 H. The Reorganized Debtors have raised with Movants certain informal objections to the  
21 relief requested in the Motions.

22 I. The Fire Victim Trustee has reviewed the Stipulation and, based on the facts  
23 presented in the Motions, has no objection to the agreements set forth herein or to entry of an Order  
24 approving the terms of the Stipulation.

25 J. The Parties hereto desire to resolve their issues regarding the Motions.

26 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
27 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
28 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
**UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT**  
**TO ORDER, THAT:**

1       1.     The Proofs of Claim shall be deemed timely filed.  
2       2.     The Proofs of Claim and Asserted Fire Victim Claims shall for all purposes be treated  
3 and classified as Fire Victim Claims under the Plan, and shall be fully assumed by, and the sole  
4 responsibility of, the Fire Victim Trust and subject to the Channeling Injunction, to be administered,  
5 processed, settled, disallowed, resolved, liquidated, satisfied, and/or paid in accordance with the Fire  
6 Victim Trust Agreement and the Fire Victim Claims Resolution Procedures. Movants shall have no  
7 further recourse against the Debtors or Reorganized Debtors, as applicable, with respect to the  
8 Proofs of Claim or the Asserted Fire Victim Claims.

9       3.     Nothing herein is intended to, nor shall it be construed to be, a waiver by the Debtors,  
10 or the Reorganized Debtors, as applicable, the Fire Victim Trust, or any other party in interest of any  
11 right to object to the Asserted Fire Victim Claims or the Proofs of Claim on any grounds other than  
12 the untimely filing thereof.

13       4.     Nothing herein is intended to, nor shall it be construed to be, a waiver by Movants of  
14 their rights to oppose any asserted challenge to the Asserted Fire Victim Claims or the Proofs of  
15 Claim.

16       5.     Upon entry of an Order approving the Stipulation, the Motion shall be deemed  
17 withdrawn with prejudice and the Hearing vacated.

18       6.     In the event that the terms of this Stipulation are not approved by the Bankruptcy  
19 Court, it shall be null and void and have no force or effect and the Parties agree that, in such  
20 circumstances, this Stipulation shall be of no evidentiary value whatsoever in any proceedings.

21       7.     This Stipulation shall be binding on the Parties and each of their successors in  
22 interest.

23       8.     This Stipulation shall constitute the entire agreement and understanding of the Parties  
24 relating to the subject matter hereof and supersede all prior agreements and understandings relating  
25 to the subject matter hereof.

26       9.     This Stipulation may be executed in counterparts, each of which shall be deemed an  
27 original but all of which together shall constitute one and the same agreement.

10. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies arising from this Stipulation or any Order approving the terms of this Stipulation.

Dated: December 17, 2020

Dated: December 17, 2020

## WEIL GOTSHAL & MANGES LLP

ABBEY, WEITZENBERG,  
WARREN & EMERY PC

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